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June 2, 2005

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: **WT Docket 94-102**
Second Amended E-911 Phase 2 Implementation Plan
Edge Wireless Licenses, LLC
TRS # 821084

Dear Ms. Dortch:

On behalf of the above-referenced carrier, and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding the company's Second Amended E-911 Phase II Implementation Plan.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,



Todd Slamowitz

cc: Jeff Cohen, Wireless Telecommunications Bureau

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List ABCDE

Edge Wireless Licenses, LLC

WT Docket 94-102

Second Amended E-911 Phase II Implementation Plan Report

Background/Contact Information

(1) **Carrier Identifying Information**

Edge Wireless Licenses, LLC
TRS # 821084

(2) **Contact Information**

Name: Eric Anderson
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E911 Phase II Location Technology Information

(1) **Type of Technology**

On November 8, 2000, Edge Wireless Licenses, LLC ("Edge") filed its initial E911 Phase II Carrier Implementation Report, indicating that it was not in a position to choose between a handset and network-based technology to meet the Commission's Phase II E911 requirements.¹

¹/The E-911 Phase II Report was filed by NewCom Wireless, LLC ("NewCom"). In November, 2000, NewCom Wireless, LLC changed its name to Edge Wireless, LLC and NewCom Wireless Licenses, LLC, a wholly-owned subsidiary of NewCom, changed its name to Edge Wireless Licenses, LLC. There was no change in ownership or corporate structure. It is also noted that Edge Wireless Licenses, LLC, a wholly-owned subsidiary of Edge Wireless, LLC, holds the PCS licenses subject to this E-911 Phase II Implementation Plan Report.

Subsequently, on March 14, 2001, Edge filed an Amended E911 Phase II Report choosing to implement a handset-based solution. However, the lack of availability from manufacturers of location capable handsets has become a major obstacle to the successful deployment of a handset-based technology its service area. Hence, Edge has now determined that a network-based technology to be the most practical means to make available Phase II services in its operating areas.

(2) Testing and Verification

Edge has not itself conducted tests of Phase II technology. It will review and evaluate the test results and accompanying technical information provided by potential providers of equipment, services and software. Edge will adopt its own testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians once a network-based solution has been implemented.

(3) Implementation Details and Schedule

It is Edge's intention to install a network based solution in accordance with a timeframe set forth in each valid PSAP request it receives.

(4) PSAP Interface

Edge intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. Edge anticipates additional hardware and software upgrades to be required; however, the specifications and schedule have not been finalized.

(5) Existing Handsets

Not applicable.

(6) Location of Non-Compatible Handsets

Not applicable.

(7) Other Information

Edge has made substantial progress toward implementation of a network-based solution. It has completed a service contract with Intrado for GMLC and MPC service for Phase I and Phase II E911 for both its TDMA and GSM networks. In addition, Intrado has assigned a project team for the Bonneville County, Idaho implementation of Phase I and Phase II service (as described below, Bonneville County, Idaho is the only PSAP in Edge's service area that is

capable of receiving Phase I and Phase II information). Edge is also negotiating for Phase II Positioning Determining Equipment (PDE) with several vendors.

Edge has received four (4) PSAP requests for Phase I and Phase II E911 service. However, only one PSAP (Bonneville County, Idaho) is capable of receiving Phase I and Phase II information. Edge will commence Phase I service with the Bonneville County Idaho PSAP in August, 2005 and Phase II service in October, 2005. With respect to the other PSAPs, Edge will continue to work with them in order to meet their E911 objectives.